

Received & Inspected

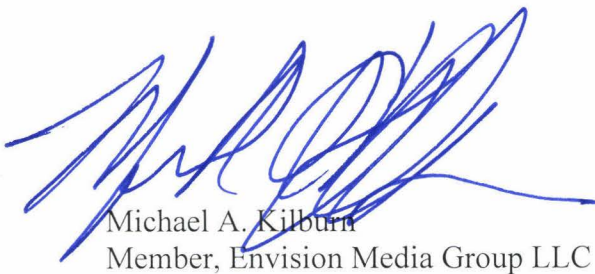
JUL -3 2012

FCC Mail Room

Office of the Secretary  
Federal Communications Commission  
Att: Disability Rights office, Room 3-B431  
9300 East Hampton Drive  
Capitol Heights, MD 20743

To Whom It May Concern:

Please accept this letter as written affirmation that the information contained in my pending captioning exemption remains current and accurate. Our case identifier is CGB-CC-0927. If you need further information don't hesitate to contact this office.



Michael A. Kilburn  
Member, Envision Media Group LLC

EXEMPTIONS TO THE CLOSED CAPTIONING REQUIREMENTS  
ON THE BASIS OF UNDUE BURDEN

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-Envision Media Group produces a weekly show to let consumers know about "Deals" in the Columbus and Dayton Ohio markets during these tough economic times. This program is done in a look live news style. The show is aired once a week on the ABC affiliate in Columbus WSYX and Dayton WKEF on Sunday at 11:30 am. Both shows are different. These shows are produced with a staff of 3 people

- The program is about deals on merchandise and services which typically have a limited time frame that they are available.

- - We do not have the equipment for transcription and it would be another added cost to purchase...In addition to high expense, captioning would also create a delay in airing of our program, due to added step of sending the tapes out for captioning."

-In speaking with other closed captioners, it was recommended that CPC is the best solution to meet our captioning needs. The total price for equipment needed would be a minimum of \$4,995 up to \$7,000. There would also need to be additional equipment to caption properly without losing a generation."

- "Subtitling and open captioning are not viable alternatives for us. If we were to produce our program using open captions or subtitles, the burden would be the same. Another option we have implemented was to present the prices on screen in the lower right hand corner although this does not meet requirements of CC rules.

- To add closed captioning to the program, we would either need to pay a captioning agency \$200 per week/ per program ((20,800.00 per year) with the possibility of not being timely enough to make air or purchase expensive equipment that is not in our budget. If we reached a point where we could purchase equipment, there would still be the need for a trained person to caption every week. Our goal of this program is to make it affordable so we can show consumers great deals, unfortunately the cost of this additional time and equipment would not make producing this show affordable

In Summary we are asking the FCC to grant us an exemption on Closed Captioning as it causes an undue burden on the basis of costs and time frame (logistics)